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November 14, 2013

Honorable Lois Bloom  
United States Magistrate Judge, USDC  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201  
via ECF

Re: Rivero v. Chase Receivables  
13-CV-3312

Dear Magistrate Judge Bloom:

As Your Honor may recall I am counsel for the Defendant named in the above-entitled action. After the conclusion of the initial conference conducted by Your Honor the parties agreed upon a monetary settlement of the above-entitled action. However, the Plaintiff has objected to the proposed general release and the proposed stipulation of voluntary dismissal which I have forwarded to him. I submit the herein letter motion to request that Your Honor allow the Defendant to file the proposed general release under seal as the Defendant desires the terms of the settlement agreement to remain confidential. If Your Honor grants the herein motion then, upon said under seal filing, I will advise Your Honor of the Plaintiff's specific objections and the Defendants disagreements therewith.

In regard to the proposed notice of voluntary dismissal. As the Defendant has yet to file an answer or move for summary judgment the voluntary dismissal is guided by Fed. R. Civ. P. 41 (a)(1)(A)(ii). I attach the proposed notice of voluntary dismissal to which the Plaintiff objects. I request that Your Honor advise the Plaintiff that the stipulation is proper.

Thank you for your attention herein.

Respectfully submitted,

/ s / *Robert L. Arleo*

Robert L. Arleo

RLA:gra  
cc: Reny Rivero via email

